

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ALEXA BRENNEMAN,	:	Case No. 1:14-CV-00136
	:	
Plaintiff,	:	Judge Michael R. Barrett
	:	
v.	:	
	:	JOINT MOTION FOR PRELIMINARY
CINCINNATI BENGALS, INC.,	:	APPROVAL OF SETTLEMENT
	:	AGREEMENT AND ORDER
Defendant.	:	<u>SCHEDULING FAIRNESS HEARING</u>
	:	

Plaintiff Alexa Brenneman and Defendant Cincinnati Bengals, Inc. respectfully move this Court for an order:

- (1) Adopting the following Rule 23 class definition agreed to by the parties: all persons who were employed by the Bengals as Ben-Gal cheerleaders at any time from February 11, 2011 through January 31, 2014;
- (2) Conditionally certifying the Rule 23 class for purposes of settlement and appointing class counsel;
- (3) Preliminarily approving the Settlement Agreement agreed upon and executed by the parties on August 21, 2015, attached hereto as Exhibit A, for the purpose of providing notice thereof;
- (4) Setting a hearing date to determine the fairness, reasonableness, and adequacy of the Settlement Agreement, and to consider class counsel's application for attorney fees; and
- (5) Approving dissemination of the notice attached as Exhibit B to members of the class to advise them of class certification, class member objection and opt-out rights, the terms of the proposed settlement, and the settlement approval process.

Respectfully submitted,

/s/ Todd B. Naylor

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Attorneys for Defendant

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served via the Court's CM/ECF system this 26 day of August, 2015, which will provide notice to all counsel of record.

/s/ Todd B. Naylor

Todd B. Naylor